

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
BALTIMORE DIVISION

In re:)	Case No. 25-12364-NVA
)	(Chapter 11)
Jefdan Properties, LLC)	
)	
Debtor.)	
_____)	

CONSENT MOTION TO SPECIALLY SET HEARINGS

Comes now WCP Fund I LLC as servicer for SF NU, LLC (“WCP”), by and through undersigned counsel, pursuant to Local Rule 9013-7, and moves this Honorable Court to consolidate and specially set hearings on the pending (i) motion, of the United States Trustee, to convert or dismiss this case (the “Motion to Convert or Dismiss”), DE #39; and (ii) motion, of WCP, for relief from the automatic stay (the “Motion for Stay Relief”), DE #42, and in support thereof states as follows:

The two pending motions are premised upon same—albeit not all—of the same factual allegations and, most pertinently, the outcome of each motion will directly inform the disposition of the other motion. By way of anecdote only, if the Motion to Convert or Dismiss invites appointment of a chapter 7 trustee, it is likely that trustee will need to be reasonably afforded time to weigh in on the Motion for Stay Relief. Similarly, if stay relief is afforded, such may bear upon the best interests of creditors in assessing whether conversion or dismissal would be preferable.

As of present, the Motion to Convert or Dismiss is set for hearing on June 27, 2025 at 2:00 pm and the Motion for Stay Relief is set for hearing on July 17, 2025 at 2:00 pm. It is believed the latter docket may be relatively crowded with unrelated matters and, equally, that disposition of these two motions may require a reasoned—albeit not overly lengthy—modicum of time.

Being cognizant of the foregoing, the parties hereto have consulted and are in general agreement that it is sensible to consolidate the two hearings. Upon a review of this Honorable Court's calendar, the parties believe July 22, 2025, at 10:30 am, would be a convenient date and time for the hearing, with both the United States Trustee and WCP consenting to the entertainment of their respective motions on that date (and waiving their right to insist upon an earlier hearing).

WHEREFORE, WCP respectfully prays this Honorable Court (i) set the Motion to Convert or Dismiss and the Motion for Stay Relief for hearing on July 22, 2025 at 10:30 am, in-person; and (iii) afford such other and further relief as may be just and proper.

Respectfully submitted,

Dated: June 24, 2025

By: /s/ Maurice B. VerStandig
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[Certificate of Service on Following Page]

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 24th day of June, 2025, a copy of the foregoing was served electronically upon filing via the ECF system with copies to:

- Robert Grossbart robert@grossbartlaw.com, debra@grossbartlaw.com
- US Trustee - Baltimore USTPRegion04.BA.ECF@USDOJ.GOV
- Maurice Belmont VerStandig mac@mbvesq.com,
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/s/ Maurice B. VerStandig
Maurice B. VerStandig